

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

SHEILA A. GARD,

Plaintiff,

v.

Case No. 20-CV-00256

UNITED STATES OF AMERICA, ET AL.,

Defendants.

**STIPULATION ON BREACH OF THE DUTY OF CARE WITH RESPECT TO
CAUSATION OF THE VEHICULAR ACCIDENT THAT IS THE SUBJECT OF THIS
LAWSUIT**

The Plaintiff and the Defendant hereby stipulate that on March 24, 2017, Mark Czecholinski, an employee of the United States Postal Service, breached the standard of care owed to the Plaintiff in the operation of a postal vehicle, just before its collision with Plaintiff's vehicle, and that breach was the sole factor in causing the accident.

The Plaintiff and the Defendant further agree that this stipulation is expressly limited to the breach of duty described above, and that said stipulation has no impact or other application upon the Plaintiff's other burdens of proof in this action, including showing that said breach of duty was the cause of the Plaintiff's alleged injuries.

Plaintiff and Defendant further agree that at trial they will not present evidence with respect to the duty of the Defendant to the Plaintiff and the Defendant's breach of that duty.

Dated at Milwaukee, Wisconsin, this 25th day of February 2022.

RICHARD G. FROHLING
United States Attorney

By: /s/ Brian E. Pawlak

BRIAN E. PAWLAK

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